

REMARKS

Applicant respectfully requests allowance of the subject application. Claims 1-2, 4-8, 10, 12-13, 15-17, 19-29, 31-32, 34-37, 39-42, 44-45 and 47 are pending, of which claims 1, 12, 13, 15, 19, 34, 40 and 44-45 are amended. Applicant respectfully traverses the rejections and requests that the Office allow all pending claims.

§ 103(A) REJECTIONS

Claims 1-12, 14-17, 19-28, 30-32, 34-42 and 44-47 stand rejected under 35 U.S.C. §103(a) as being unpatentable over “SMIL 2.0 XML for Web Multimedia” by Lloyd Rutledge (hereinafter, “SMIL”) in view of U.S. Patent No. 6,473,096 to Kobayashi et al (hereinafter, “Kobayashi”). Applicant respectfully traverses the rejection. Nevertheless, for the sole purpose of expediting allowance and without conceding the propriety of the Office’s rejections, Applicant has amended the independent claims as discussed during the interview and as shown above.

Before discussing the substance of the Office’s rejections, however, the following discussion of Applicant’s disclosure, as well as the newly-cited Kobayashi reference, is provided to assist the Office in appreciating the patentable distinctions between Applicant’s claimed subject matter and Kobayashi.

APPLICANT’S DISCLOSURE

The description provided in this section is provided to assist the Office in appreciating the subject matter described in Applicant’s specification. The

description is not intended to be used to imply or impose specific limitations with regard to Applicant's claims.

Perhaps a good place to start to gain an appreciation of the claimed subject matter is in Applicant's "Background" section. There, the "Background" section describes that multimedia presentations are made up of discrete multimedia or audio video (A/V) objects (multimedia objects). Multimedia objects may originate from one source such as a digital versatile disc (DVD) disc played on a drive on a personal computer (PC). In other cases multimedia objects may originate from (i.e., streamed from) multiple sources and played at a common destination. For example, multimedia objects may originate from multiple websites and played at a PC. Multimedia presentations may include and combine multimedia objects from videotape, a television broadcast, DVD, and from a website on the Internet (i.e., evolving web broadcast). Background, p. 1, lines 11-19.

Although data or media objects may originate from one or multiple sources, when using SMIL, data or media objects must be "linked" together by a single SMIL document. In other words, the single SMIL document is needed to link multimedia objects with one another. Id. at p. 2, lines 13-16.

External style sheets, meanwhile, may be provided as a reference for documents as to structure and appearance information. In other words, external style sheets provide the ability to describe appearance and structure of objects in other documents; however, external style sheets and XML documents do have the ability to describe when objects are to be played or presented.

XML does not provide temporal reference for multimedia objects. SMIL provides the temporal reference for multimedia objects; *however, SMIL is relatively inflexible and requires that multimedia objects be reference directly by a single SMIL document. In other words, unlike extensible textual markup languages like XML, SMIL does not allow documents to control other documents.* Id. at p. 3, lines 9-18 (emphasis added).

With this background in mind, Applicant's disclosure begins with Fig. 1 (reproduced below), which shows documents and objects that are used to define a multimedia presentation 100. Multimedia presentation 100 includes objects 105. Objects 105 may be one or more multimedia objects. Detailed Description, p. 4, lines 18-20.

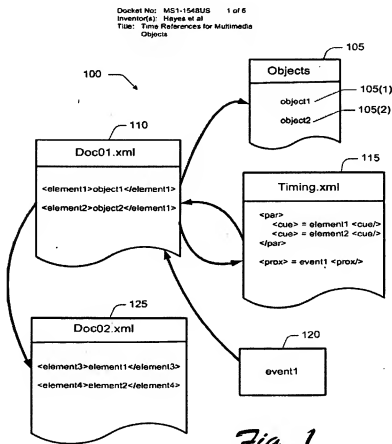


Fig. 1

The multimedia presentation 100 includes document Doc01.xml 110. Doc01.xml is a *“content document”* that is formatted in a textual markup language such as XML or SGML (HTML). Doc01.xml 110 *includes tagged elements that reference multimedia objects*. Id. at p. 5, lines 1-4 (emphasis added).

Multimedia presentation 100 further includes a document Timing.xml 115. Here, *Doc01.xml 110 and Timing.xml 115 are logically distinct document types*. Timing.xml 115 is a *“timing document”* that may also formatted in a textual markup language such as XML. Timing.xml 115 includes a time container 117 that describe the behavior of element1 and element2 of Doc01.xml 110. *Time containers provide rendition timings for elements that may in turn reference multimedia objects*. Id. at p. 4, line 20 through p. 5, line 1 (emphasis added).

Furthermore, an event may take place that affects elements in the timed document Doc01.xml 110. An event is special object that is created when something occurs such as an input from a user. An example of an event is a user pausing play by activating a “pause button”.

Events in Doc01.xml may be handled through “EventListener” document object model (DOM) constructs as defined by the World Wide Web Consortium (W3C). In particular, events may be looked for and handled through a construct defining an element “listener”.

In this example an event “pause button” 120 takes place and may affect element1 or element2 of Doc01.xml 110. Doc1.xml 110 may include a listener element 124 that is listed as follows:

```

<listener
    event = "pause button"
    observer = "ID1"
    handler = "stop"
/>

```

The listener element 124 is configured to watch for the event “pause button” 120. “ID1” identifies element n which might be for example, one of element1 or element2. An element may be a “target” which is affected by the event. For example, element1 and/or element2 may be a target element affected by event “pause button” 120. An “observer” element may or may not be a target element, but is made aware of an event that affects elements (i.e., target elements) that are levels below it (i.e., are children elements of a parent observer element). For example, element n may be an observer when element1 and element2 are targets. The observer attribute in element 124 uses the identifier “ID1” to identify element n.

An attribute “handler” is activated when an event occurs in the target element. In this example, the attribute handler names an application “stop” to be activated. The application “stop” may be a defined instruction within Doc01.xml to instruct elements to pause play.

Since timing document Timing.xml 115 defines timing for timed document Doc01.xml 110, it may be made aware of event “pause button” 120 affecting elements in Doc01.xml 110.

Timing.xml 115 is provided a proxy listener element 126 that is listed as follows:

```
<listener = "proxy"
    event = "pause button"
    observer = pointer to "ID1"
    handler = "pause"
/>
```

Proxy listener 126 is also configured to look for the event "pause button"

120. Instead of an observer attribute that directly identifies element n through identifier "ID1" a pointer to "ID1" is used in an observer attribute of proxy listener element 126. In this example the observer attribute of proxy listener element 126 is extended to be a selector (i.e., using a pointer such as Xpointer in XML). The syntax "ID1" refers to the identifier of an element in Doc01.xml 110, not an element in Timing.xml 115. An attribute handler may be activated when event "pause button" 120 occurs in a target element (e.g., element1 or element2). In proxy listener 126, the attribute handler names an application "pause" which instructs time container 117 to pause play.

Proxy listener element 126 in the timing document Timing.xml 115 does not require or rely on having the listener element 124 in Doc01.xml. Proxy listener element 126 points directly at the element using the pointer to "ID1". Id. at p. 8, line 1 through p. 10, line 5 (emphasis added).

THE KOBAYASHI REFERENCE

Kobayashi, meanwhile, describes a device and a method of generating a scenario used for presentation materials. A descriptive operation input part is used to perform descriptive operation while contents retained in a contents holding part

is being reproduced and operated under control by a contents reproducing part. *A history indicative of the descriptive operations is retained in a descriptive operation history holding part* and speaker information from a speaker information input part is retained in a speaker information holding part. In a scenario generation processing part, a history information separating part separates the history information related to the descriptive operations into information. Based on the separated information, a descriptive operation contents generating part generates tool-operation reproducing contents, which is in turn retained in a descriptive operation contents holding part. A scenario output part generates a basic scenario, based on history information related to control operations and adds the relationship of synchronism and reproduction between the descriptive operation contents and the speaker information to the basic scenario to thereby complete a scenario. Abstract (emphasis added).

Importantly, because the Kobayashi method tracks and retains a static history of a multimedia presentation, Kobayashi has not been shown to allow a user to modify a timing of the presentation by re-arranging this tracked history.

THE CLAIMS

Claim 1 has been amended and, as amended, recites a method performed by a computer comprising (added language underlined):

- referencing one or more multimedia objects through a first set of one or more elements in a content document;
- associating, in a timing document that is separate from the content document, the first set of one or more elements with a second set of one or more elements in the timing document by referencing at least

a portion of the first set of one or more elements to one or more elements in the second set of one or more elements;

- arranging the second set of one or more elements in the timing document to indicate timing for the multimedia objects referenced by the first set of one or more elements;
- receiving an input to initiate an event affecting an element in the first set of one or more elements in the content document;
- providing a proxy element in the second set of elements in the timing document that is configured to reference application of the event; and
- rendering the multimedia objects based on the arranging of the second set of one or more elements.

In making out a rejection of claim 1 before its amendment, the Office states that the combination of SMIL and Kobayashi renders claim 1 obvious. Applicant respectfully disagrees. Nevertheless, for the sole purpose of advancing prosecution and without conceding the propriety of the rejection, Applicant has amended this claim as shown above. Applicant respectfully submits that neither of the cited references have been shown to teach or suggest at least the language added to this claim.

In the Action, the Office aptly states that SMIL fails to disclose Applicant's claimed "arranging" and "referencing" elements reproduced above. Applicant agrees that SMIL contains no such teachings. However, the Office then submits that Kobayashi's discussion of tracking history information, discussed above, as teaching these elements. Applicant respectfully disagrees. Nevertheless, for the sole purpose of expediting allowance of this application, Applicant has further highlighted these claim elements as shown above.

With these highlighting amendments in mind, Applicant respectfully submits that Kobayashi's tracking of history information—as well as Kobayashi as a whole—fails to teach or suggest “arranging the second set of one or more elements in the timing document [that is separate from the content document] to indicate timing for the multimedia objects referenced by the first set of one or more elements [in the content document],” as recited in Applicant's claim 1.

Instead, Kobayashi has at most been shown to disclose tracking and retaining history information of a multimedia presentation. However, Kobayashi does not discuss “arranging” elements within this tracked history. Further, Applicant respectfully submits that Kobayashi would not be motivated to rearrange this tracked history, as doing so would change the order of the multimedia presentation—thus defeating the entire purpose of tracking and retaining the history information.

Furthermore, Applicant respectfully submits that Kobayashi has not been shown to teach or suggest a “timing document” that is separate from a content document. Instead, Kobayashi has merely been shown to disclose a static document consisting of history information. However, a standalone static document fails to teach or suggest a “timing document [that is separate from the content document] to indicate timing for the multimedia objects referenced by the first set of one or more elements [in the content document],” as recited in Applicant's claim 1.

Applicant similarly submits that SMIL has not been cited as teaching these claim elements, nor does SMIL so teach. During the afore-mentioned interview, Applicant understood the Office to at least tentatively agree that the cited

combination fails to teach this amended claim language. Applicant sincerely thanks the Office for this indication.

For at least this reason, Applicant respectfully requests that this claim be deemed allowable.

Furthermore, Applicant respectfully submits that the cited combination has also not been shown to teach or suggest the following language added to independent claim 1:

- receiving an input to initiate an event affecting an element in the first set of one or more elements in the content document; [and]
- providing a proxy element in the second set of elements in the timing document that is configured to reference application of the event

Again, during the afore-mentioned interview, Applicant understood the Office to at least tentatively agree that the cited combination fails to teach this amended claim language. Applicant sincerely thanks the Office for this indication.

For at least these additional reasons, Applicant respectfully requests that this claim be deemed allowable.

Dependent claims 2, 4-8, 10, 12-13, 15-17 depend from independent claim

1. Each of these claims is therefore allowable by virtue of this dependency, as well as for the additional features that each recites.

Claim 19 recites a method performed by a computer comprising (added language underlined):

- referencing one or more multimedia objects through a first set of one or more elements in a first document;

- associating the first set of one or more elements in the first document to a second set of one or more elements in a second document that is separate from the first document, the associating comprising referencing at least a portion of the first set of one or more elements to one or more elements in the second set of one or more elements;
- arranging the second set of one or more elements of the second document to indicate timing for the multimedia objects referenced by the first set of one or more elements in the first document;
- receiving an input to initiate an event affecting an element in the first set of one or more elements of the first document;
- providing a proxy element in the second document that is configured to reference initiation of the event; and
- rendering the multimedia objects based on the arranging of the second set of one or more elements.

In making out a rejection of claim 19 before its amendment, the Office states that the combination of SMIL and Kobayashi renders this claim obvious. Applicant respectfully disagrees. Nevertheless, for the sole purpose of advancing prosecution and without conceding the propriety of the rejection, Applicant has amended this claim as shown above. Applicant respectfully submits that neither of the cited references have been shown to teach or suggest at least the language added to this claim for at least reasons similar to those discussed above in regards to claim 1.

For at least these reasons, Applicant respectfully requests that this claim be deemed allowable.

Dependent claims 20-29 and 31-32 depend from independent claim 19. Each of these claims is therefore allowable by virtue of this dependency, as well as for the additional features that each recites.

Claim 34 recites a multimedia device comprising (added language underlined):

- a processor; and
- instructions stored in a memory and executable on the processor configured to associate a first document with a second document that is separate from the first document through referencing at least a portion of a first set of elements in the first document in at least a portion of a second set of elements in the second document, wherein the first set of elements reference multimedia objects and the second set of elements are arranged to provide a rendition timing for the multimedia objects; and
- wherein the instructions are further configured to:
 - receive an input to initiate an event affecting an element in the first set of one or more elements in the first document;
 - provide a proxy element in the second set of elements in the second document that is configured to reference application of the event; and
 - render the multimedia objects based on the arranging of the second set of one or more elements.

In making out a rejection of claim 34 before its amendment, the Office states that the combination of SMIL and Kobayashi renders this claim obvious. Applicant respectfully disagrees. Nevertheless, for the sole purpose of advancing prosecution and without conceding the propriety of the rejection, Applicant has amended this claim as shown above. Applicant respectfully submits that neither of the cited references have been shown to teach or suggest at least the language added to this claim for at least reasons similar to those discussed above in regards to claim 1.

For at least these reasons, Applicant respectfully requests that this claim be deemed allowable.

Dependent claims 35-37 and 39 depend from independent claim 34. Each of these claims is therefore allowable by virtue of this dependency, as well as for the additional features that each recites.

Claim 40 recites one or more computer-readable media carrying data structures comprising (added language underlined):

- a first content document formatted in a textual markup language having tagged elements that reference one or more multimedia objects; and
- a timing document formatted in a textual markup language having a plurality of tagged elements; at least some of the tagged elements of the timing document referencing the elements of the first content document; and the tagged elements of the timing document specifying rendition timings for the multimedia objects referenced by the tagged elements of the first content document;
- wherein the plurality of tagged elements of the timing document includes a proxy element configured to reference application of an event affecting an element in the tagged elements of the content document in response to receiving an input to initiate the event.

In making out a rejection of claim 40 before its amendment, the Office states that the combination of SMIL and Kobayashi renders this claim obvious. Applicant respectfully disagrees. Nevertheless, for the sole purpose of advancing prosecution and without conceding the propriety of the rejection, Applicant has amended this claim as shown above. Applicant respectfully submits that neither of the cited references have been shown to teach or suggest at least the language added to this claim for at least reasons similar to those discussed above in regards to claim 1.

For at least these reasons, Applicant respectfully requests that this claim be deemed allowable.

Dependent claims 41-42 depend from independent claim 40. Each of these claims is therefore allowable by virtue of this dependency, as well as for the additional features that each recites.

Claim 44 recites one or more computer-readable media carrying data structures comprising (added language underlined):

- a first document formatted in a textual markup language having tagged elements that reference one or more multimedia objects; and
- a second document formatted in a textual markup language having a plurality of tagged elements; at least some of the tagged elements of the second document referencing the tagged elements of the first document, wherein the tagged elements of the second document specify rendition timings for the multimedia objects that are referenced by the tagged elements of the first document;
- wherein the plurality of tagged elements of the second document includes a proxy element configured to reference application of an event affecting an element in the tagged elements of the first document in response to receiving an input to initiate the event.

In making out a rejection of claim 44 before its amendment, the Office states that the combination of SMIL and Kobayashi renders this claim obvious. Applicant respectfully disagrees. Nevertheless, for the sole purpose of advancing prosecution and without conceding the propriety of the rejection, Applicant has amended this claim as shown above. Applicant respectfully submits that neither of the cited references have been shown to teach or suggest at least the language added to this claim for at least reasons similar to those discussed above in regards to claim 1.

For at least these reasons, Applicant respectfully requests that this claim be deemed allowable.

Claim 45 recites system comprising (added language underlined):

- a broadcast point providing multimedia objects; and
- a multimedia device that receives the multimedia objects, a first document that references the multimedia objects through a first set of one or more elements, and a second document, separate from the first document, that: (i) is associated with the first document through referencing of at least a portion of the first set of one or elements of the first document in a second set of one or more elements in the second document; and (ii) provides rendition timing for the multimedia objects through arrangement of the second set of one or more elements in the second document;
- wherein the multimedia device further receives an input that initiates an event in the first document, and informs the second document.

In making out a rejection of claim 45 before its amendment, the Office states that the combination of SMIL and Kobayashi renders this claim obvious. Applicant respectfully disagrees. Nevertheless, for the sole purpose of advancing prosecution and without conceding the propriety of the rejection, Applicant has amended this claim as shown above. Applicant respectfully submits that neither of the cited references have been shown to teach or suggest at least the language added to this claim for at least reasons similar to those discussed above in regards to claim 1.

For at least these reasons, Applicant respectfully requests that this claim be deemed allowable.

Dependent claim 47 depends from independent claim 45. This claim is therefore allowable by virtue of this dependency, as well as for the additional features that it recites.

Conclusion

Applicant respectfully submits that all pending claims are in condition for allowance. If any issues remain that preclude allowance of this application, the Examiner is urged to contact the undersigned attorney before issuing a subsequent action.

Respectfully Submitted,

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